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10 Attorneys for Defendants
11 UNUM GROUP (formerly known as
12 UNUMPROVIDENT CORPORATION),
13 UNUM CORPORATION (a now non-existent
14 entity, properly referred to as Unum Group)
15 and METLIFE INSURANCE COMPANY
16 (successor in interest by merger to
17 NEW ENGLAND MUTUAL
18 LIFE INSURANCE COMPANY)

19 UNITED STATES DISTRICT COURT
20 NORTHERN DISTRICT OF CALIFORNIA

21 CLAUDIA L. BLAKE

22 Plaintiff,

23 vs.

24 UNUMPROVIDENT CORPORATION;
25 UNUM CORPORATION, NEW ENGLAND
26 MUTUAL LIFE INSURANCE COMPANY,
27 COMMISSIONER OF THE CALIFORNIA
28 DEPARTMENT OF INSURANCE, and DOES
1 through 20 inclusive,

Defendants.

Case No.: C07-4366 EMC

**DECLARATION OF SUSAN ROTH IN
SUPPORT OF DEFENDANTS'
OPPOSITION TO MOTION TO
REMAND**

1 I, Susan Roth, declare as follows:

2 1. I am over the age of 21 years, and I am the Vice President, Transactions, SEC and
3 Corporate Secretary for Unum Group, formerly known as UnumProvident Corporation. I have
4 held the position of Corporate Secretary at all times relevant hereto. I have personal knowledge
5 of the matters set forth herein and could competently testify to the same if called upon to do so.

6 2. I submit this declaration in support of Defendants' opposition to Plaintiff's
7 motion to remand.

8 3 By virtue of my employment, I have knowledge of the corporate structure of the
9 entities comprising the Unum Group.

10 4. Unum Group is a general business corporation organized under the laws of the
11 State of Delaware, with its principal place of business located in Chattanooga, Tennessee. Unum
12 Group was formerly known as UnumProvident Corporation

13 5. Unum Group is not an insurance company, it is a non-insurance holding company
14 for all of its subsidiary companies. Only certain of its subsidiaries are licensed and authorized to
15 conduct the business of insurance.

16 6. There is no longer a legal entity known as Unum Corporation.

17 I declare under penalty of perjury under the laws of the State of California, State of
18 Tennessee, and of the United States that the foregoing is true and correct. Executed this 29th day
19 of October, 2007, at Chattanooga, Tennessee.

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21 Susan Roth

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